

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

SHELLY M. FORREST,

Plaintiff,

vs.

CITY OF OSWEGO, CITY OF OSWEGO POLICE
DEPARTMENT and OFFICER JERRY MOSQUEDA,

Defendants.

**CONFIDENTIALITY
STIPULATION**

Case No. 5:07-cv-1017
DNH-GJD

WHEREAS plaintiff Shelly M. Forrest has requested certain documents pertaining to defendant Jerry Mosqueda, including his personnel and training records, and

WHEREAS defendants Mosqueda, City of Oswego Police Department and City of Oswego, New York each maintain those documents contain confidential and private personal information, and

WHEREAS the parties have agreed to enter into a confidentiality order with respect to the documents, it is hereby agreed as follows:

1. The parties may produce the requested documents stamped as "confidential." By executing this Agreement, the parties are not waiving the right to request additional documents beyond those produced.

2. The parties agree that documents stamped as "confidential" will be used only for the purposes of this litigation, and will not be disclosed to any third parties, and if used in a court filing will be filed under seal.

3. At the conclusion of this action by settlement, judgment or otherwise, the parties and their counsel will return the confidential documents to the attorneys for the opposing

party, together with a certification that they have not retained any copies of the confidential documents.

Dated: July 31, 2009

BOND, SCHOENECK & KING, PLLC

By: *S/Lillian Abbott Pfohl*
Lillian Abbott Pfohl
Attorneys for Defendant
City of Oswego and Oswego City
Police Department
One Lincoln Center
Syracuse, New York 13202
Telephone: (315) 218-8000

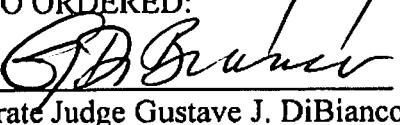
RODAK & KIRWAN

By: *s/ Joseph G. Rodak*
Joseph G. Rodak, Esq.
Attorney for Defendant
Jerry Mosqueda
55 West Second Street
Oswego, New York
Telephone: 315-324-7214

DIANE MARTIN-GRANDE

By: *s/ Diane Martin -Grande*
Diane Martin-Grande
Attorney for Plaintiff
11109 Floyd Avenue
Rome, New York 13440

IT IS SO ORDERED:


Magistrate Judge Gustave J. DiBianco

Enter.